



MEMO ENDORSED

MURIEL GOODE-TRUFANT
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

May 2, 2025

Marina Moraru
Special Assistant Corporation Counsel
Office: 212) 356-2456

VIA ECF

Hon. Richard M. Berman
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, New York 10007

SO ORDERED:

RMB
RICHARD M. BERMAN U.S.D.J.

5/5/25

Re: *L.B. v. N.Y.C. Public Schools*, 25-2963 (RMB)(SLC)

Dear Judge Berman:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on administrative hearings under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request an extension of Defendant's time to respond to the Complaint, from May 6 to August 14, 2025, i.e. 90-days from the date Plaintiff has agreed to provide the needed billing records (and a privilege log, if redacted for privilege) (May 16, 2025). This is the first request for an extension of this deadline. Upon receipt of the billing records from opposing counsel, Defendant can begin its internal settlement review process which includes a review of the underlying administrative record together with the billing records. We have resolved recent similar IDEA fees-only cases brought by plaintiffs represented by the Roller firm without the need to burden the court with any sort of motion practice, conferences or even the need to file an Answer. The parties are hopeful this matter will be resolved as well. Additionally, as this is an IDEA fees-only claim and neither liability nor discovery is at issue, Defendant respectfully requests the adjournment, *sine die*, of the in-person Initial Pretrial Conference ("IPTC") currently scheduled for May 14, 2025, and the attendant submissions. Plaintiff consents to these requests.

Accordingly, Defendant respectfully requests that Defendant's time to respond to the complaint be extended to August 14, 2025, with a joint status letter due that same date advising the Court of the status of settlement negotiations, and that the Court adjourn the IPTC and attendant submissions, *sine die*.

Thank you for considering these requests.

Respectfully submitted,
/s/ Marina Moraru

Marina Moraru, Esq.
Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)